

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

ALAMEDA RESEARCH LLC, ALAMEDA
RESEARCH LTD., FTX TRADING LTD.,
WEST REALM SHIRES, INC., and WEST
REALM SHIRES SERVICES, INC.,

Plaintiffs,

-against-

FTX DIGITAL MARKETS LTD., BRIAN C.
SIMMS, KEVIN G. CAMBRIDGE, and
PETER GREAVES, and J. DOES 1–20

Defendants.

Adv. Pro. No. 23-50145 (JTD)

Re: Adv. Docket Nos. 1, 3, 4, 6 & 7

**DECLARATION OF ASHLEY RONA CHASE IN SUPPORT OF MOTION OF FTX
DIGITAL MARKETS LTD. AND THE JOINT PROVISIONAL LIQUIDATORS TO
DISMISS THE COMPLAINT OR, IN THE ALTERNATIVE, TO ABSTAIN FROM
RULING ON COUNTS I-IV**

I, Ashley Rona Chase, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney with the law firm of White & Case LLP, counsel to FTX Digital Markets, Ltd. (“**FTX Digital**”), Brian C. Simms KC, Kevin G. Cambridge, and Peter Greaves in

¹ The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the debtors (the “**U.S. Debtors**”) and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Chapter 11 Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

their capacity as the duly appointed joint provisional liquidators of FTX Digital and foreign representatives of the Provisional Liquidation of FTX Digital (the “**Joint Provisional Liquidators**”).² I am admitted to practice *pro hac vice* before the Court in this action. [D.I. 1451]. I submit this declaration in support of the *Motion of FTX Digital Markets Ltd. and the Joint Provisional Liquidators to Dismiss the Complaint, or, in the Alternative, to Abstain from Ruling on Counts I-IV*.

2. This declaration is based on my personal knowledge and upon my review of the records of this and related matters.

3. Attached hereto as **Exhibit A** is a true and correct copy of an article in the Financial Times by Michelle Chan titled, *Hong Kong’s 29 Year-Old Crypto Billionaire: FTX’s Sam Bankman-Fried*, dated July 4, 2021.

4. Attached hereto as **Exhibit B** is a true and correct copy of an article in The Tribune by Neil Hartnell titled, *FTX to Hire More Than 100 Bahamians for Crypto Work*, dated October 19, 2022.

5. Attached hereto as **Exhibit C** is a true and correct copy of the Terms of Service uploaded to the FTX.com site on May 13, 2022.

6. Attached hereto as **Exhibit D** is a true and correct copy of the Bahamas Lift Stay Order, dated March 21, 2023.

Executed on May 8, 2023 in New York, New York.

/s/ Ashley Rona Chase
Associate
White & Case LLP

² Capitalized terms not defined herein shall have the meaning ascribed to them in the *Motion of FTX Digital Markets Ltd. and the Joint Provisional Liquidators to Dismiss the Complaint, or, in the Alternative, to Abstain from Ruling on Counts I-IV*, filed simultaneously herewith.